

Comment about interoperability of equipment: The VP-100 that is proprietary to Sorenson Communications is interoperable with other video systems in that point to point calls can be made with a VP-100 to other videophones and webcams. This is appropriate interoperability. However, the VP-100, engineered by Sorenson Communications and made available only to deaf and hard of hearing people at no cost to the consumers, is an invention that is proprietary to Sorenson Communications. Thus, it is appropriate that consumers must use Sorenson VRS to place video relay calls when using the Sorenson VP-100. Forcing Sorenson to allow use of their device to call other relay services would be highly inappropriate, especially given the fact that there are other devices already in use and that can be installed in the consumers' homes that will allow calls to other VRS providers. If this was the case, then there would be no incentive for any VRS provider to improve upon the current technology knowing that their devices would be distributed to their competitors. Please do not implement an interoperability requirement for these devices.

Comment about Speed of Answer: Until the interpreter shortage is addressed, and adequate numbers of interpreters are available to process VRS calls, a speed of answer rule would severely tax the current resources of all VRS providers, leading to reduced hours of operation and, possibly, violations of the speed of answer rule. Interpreters are not operators, nor are they machines; they are people who are professionally trained to facilitate communication between other people by interpreting from ASL to English. Each call is different; each caller's situation is different, and each call takes a different amount of time accordingly. At this point, the interpreters working in the field are doing all they can to answer calls as quickly as possible. It is better to have a longer wait time with 24/7 operations than to have a shortened wait time with limited hours - this would most definitely not be an equal access situation. Please do not implement the speed of answer rule at this time.

I fear that if the FCC imposes a speed of answer requirement that the quality of VRS will decrease and Sorenson's 24/7 operations would be reduced. I would rather have the freedom of choice to choose a higher quality experience with longer hold times than be forced to have quicker answer times with lower quality interpretation and/or reduced hours and poor video quality. Please do not implement a speed of answer requirement at this time.